

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PRIYA HARRIRAM,

Plaintiff,

22- CV-9712 (RA)(BCM)

– against –

CITY UNIVERISITY OF NEW YORK and

BRIDGET BARBERA,

Defendants.

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**PLAINTIFFS PRIYA HARRIRAM RULE 56.1 STATEMENT OF UNDISPUTED
MATERIAL FACTS IN SUPPORT OF PLAINTIFF MOTION FOR
OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT**

Pursuant to Rule 56.1 of the Local Rules of the Southern District of New York, Plaintiff, Priya Harriram submit this statement of undisputed material facts in support of Plaintiff motion, pursuant to Federal Rule of Civil Procedure 56, in opposition for summary judgment granting Plaintiff's remaining claims for retaliation under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.* ("Title VII"), Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681, *et seq.*, ("Title IX"), the New York State Human Rights Law, N.Y. Exec. Law § 296 ("NYSHRL"), and the New York City

Human Rights Law, N.Y.C. Admin. Code § 8-107 (“NYCHRL”) against Defendants as set forth in her Complaint, filed November 14, 2022 (ECF No. 2, “Compl.”) as follows:

A. Background

1. Plaintiff was not terminated for cause on November 8, 2021 because she did send anonymous emails and a anonymous letter against a Lehman employee. The College does not know where those anonymous emails and the anonymous letter came from therefore they don't know who sent it. (*See Exhibit 1*)
2. Plaintiff had a masters prior to Fall 2022, but not in Math. Her masters was in Math-education. She never finished her Pure Math Masters, like she states **Exhibit 60** Harriram Depo at 17:16-25, **Exhibit 61** Harriram Depo 18:1-25 **Exhibit 62** Harriram Depo 19:1-20.

B. Plaintiff’s Application for a Position at Lehman for the Fall 2022 Semester

3. Plaintiff had tried many times to rematriculate at Lehman, but since Barbera had disabled Plaintiff’s CUNYfist account with Lehman College two weeks after her wrongful termination, this prevented Plaintiff from registering for classes, on November 8, 2021. However, eventually Plaintiff gained access to be able to rematriculate at Lehman in Fall 2022.
4. On or about August 29, 2024 Ms. Patrick gave Plaintiff the onboarding papers to get ready to work for 9/6/22.
5. Natalie Zambra is the third in command and Zorida Rosa is the second in command and could have made that decision to process the onboarding papers, even through Eric

was issued as a form of retaliation because Barbera states that Plaintiff did not harass Barbera and Washington states he is not threatened by Plaintiff.

13. Plaintiff had no knowledge of No Contact order prior to it being issued, otherwise it would have been requested against the professors.

14. The No Contact order stays on Plaintiff academic record

15. Plaintiff discussed the No Contact order with Mr. Santos.

16. Plaintiff wants the actuarial science certificate and Lehman offers without doing a degree. It is only 20 credits. At Hunter and Baruch you have to do a degree, however Lehman College was offering this as a certificate, not a degree.

17. Plaintiff lives minutes away from Campus and would prefer accommodations to take her class at school and because she learns better with lecture taught in person.

18. Plaintiff asked Mr. Santos to take classes at Lehman.

Respectfully Submitted,
